

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: WILLIAM MATTHEW RHODES and : Bankruptcy Case No. 16-70077-JAD  
SHANNON VIRGINIA RHODES, :  
:   
Debtors : CHAPTER 13  
:   
WILLIAM MATTHEW RHODES and : Doc. No. \_\_\_\_\_  
SHANNON VIRGINIA RHODES, :  
Movants :  
vs. :  
RONDA J. WINNECOUR, Trustee, : Hearing Date/Time:  
Respondent :

**NOTICE OF PROPOSED MODIFICATION TO  
CONFIRMED PLAN DATED FEBRUARY 8, 2016**

1. Pursuant to 11 U.S.C. § 1329, the Debtors are filing simultaneously herewith **Amended Chapter 13 Plan Dated September 19, 2019**, which is annexed hereto as Exhibit A (“Amended Chapter 13 Plan”). Pursuant to the Amended Chapter 13 Plan, the Debtors seek to modify their Chapter 13 Plan Dated February 8, 2016, in the following particulars:

At the time of filing their Plan, the Debtors had two (2) secured debts consisting of their mortgage and a truck loan. Debtors had zero (0) unsecured debt. However, Debtors had fallen into arrearages on their mortgage, thereby causing the filing of this Chapter 13 action.

Since that time, the truck loan as well as the attorney fees have been paid in full. Therefore, Debtors are requesting that their the monthly payment be reduced to ONE THOUSAND SIX HUNDRED SIXTY DOLLARS AND SEVENTY-SEVEN CENTS (\$1,660.77), calculated as follows:

LSF9 Master Participation Trust	
(Mortgage on Debtors’ residence)	879.62
LSF9 Master Participation Trust	
(Payment of Mortgage Arrearages)	702.07
Chapter 13 Trustee Fee	<u>79.08</u>
Total	\$1,660.77

2. The proposed modification to the confirmed Plan will not impact the treatment of any

claims as the payments to the remaining creditors will remain the same as in the Confirmed Plan dated February 8, 2016.

3. The Debtors submit that the requested modification is being proposed in good faith, and not for any means prohibited by applicable law. The Debtors further submit that the proposed modification complies with 11 U.S.C. §§ 1322(a), 1322(b), 1325(a) and 1329 and, except as set forth above, there are no other modifications sought by way of this Amended Chapter 13 Plan.

WHEREFORE, the Debtors respectfully request that the Court enter an Order confirming this **Amended Chapter 13 Plan Dated September 19, 2019**, and for such other relief that the Court deems equitable and just.

RESPECTFULLY SUBMITTED, this 19th day of September, 2019.

Respectfully submitted,

Forr, Stokan, Huff, Kormanski & Naugle

*/s/James R. Huff, II*

By: \_\_\_\_\_

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Dated: September 19, 2019